

EXHIBIT 1

NWAUZOR et. al vs GEO GROUP
Munson, Jeffrey - December 12, 2019

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

NWAUZOR et. al,)	
)	
Plaintiff,)	
)	
vs.)	No.
)	3:17-cv-05769-RJB
THE GEO GROUP,)	
)	
Defendant.)	

DEPOSITION OF JEFFREY MUNSON, PH.D.

December 12, 2019

Seattle, Washington

1 Q So then your main job is dealing with data you've been
2 provided. Or assessing data you've been --

3 A Yeah.

4 Q -- provided.

5 A That's my main role in the -- the research I'm involved
6 in currently.

7 Q Okay. So in terms of data analysis, do you have any
8 specific qualifications? Certificates?

9 A No certificates other than graduate-level courses in
10 a variety of statistical techniques. The -- the core
11 sort of statistical coursework in my degree program, but
12 I've taken additional courses as well, and we have
13 different multivariant statistical techniques.

14 Q You mentioned numerous "statistical techniques."

15 What are those techniques?

16 A They could be the -- the names of different statistical
17 techniques can be clumped at different levels of
18 generality.

19 So aiming for the level at which I think of, one
20 is sort of linear mixed models, which is one statistical
21 technique that allows you to analyze data that's
22 collected across multiple levels. Repeated observations
23 with an individual and then those observations across
24 multiple individuals would create two different levels
25 of data. So intermixed models, simple things of looking

1 told how it was generated and what it purports, but
2 I pretty much take it on -- as face valid.

3 Q Uh-huh. What do you do when you're presented with
4 conflicting datasets or datasets that indicate that one
5 of them cannot be correct?

6 A If one cannot be correct but both are theoretically
7 potentially valid, I would speak to the -- the attorneys
8 I'm involved with and, you know, seek guidance from their
9 part on what to assume is correct.

10 Q And did you do that here?

11 A I don't believe so. I think the information I've
12 analyzed that are in the report was -- just took what
13 was -- what was there and carried out the steps
14 I described.

15 Q Okay. Do you have any experience calculating back wages?

16 A Yes.

17 Q What is that experience?

18 A I've been involved in I think 40 or so different cases
19 where I've been asked to calculate -- well, I've been
20 asked to calculate damages, so maybe this changes my
21 answer. You said wages. Back wages. Again, I'm asked
22 usually to address, you know, one or more different
23 claims in a suit, like missed breaks or unpaid work,
24 unpaid overtime, things like that. So I've been asked to
25 calculate each of those types of things. Some of those

1 STATE OF WASHINGTON) I, April Cook, CCR #3245,
2) ss a certified court reporter
3 County of Pierce) in the State of Washington, do
4 hereby certify:

5 That the foregoing deposition of JEFFREY MUNSON, PH.D.
6 was taken before me and completed on December 12, 2019, and
7 thereafter was transcribed under my direction; that the
8 deposition is a full, true and complete transcript of the
9 testimony of said witness, including all questions, answers,
10 objections, motions and exceptions;

11 That the witness, before examination, was by me duly
12 sworn to testify the truth, the whole truth, and nothing but
13 the truth, and that the witness reserved the right of
14 signature;

15 That I am not a relative, employee, attorney or counsel
16 of any party to this action or relative or employee of any
17 such attorney or counsel and that I am not financially
18 interested in the said action or the outcome thereof;

19 That I am herewith securely sealing the said deposition
20 and promptly delivering the same to Adrienne Scheffey.

21 IN WITNESS WHEREOF, I have hereunto set my signature on
22 the 15th day of December, 2019.

23
24
25


April Cook, CCR
Certified Court Reporter No. 3245
(Certification expires 10/11/20.)